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September 25, 2018

Via ECF

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street, Chambers 1350
New York, NY 10007

Re: L.V.M. v. Lloyd et al., No. 18-cv-01453 (PAC)

Dear Judge Crotty:

On behalf of the plaintiffs in this case challenging the prolonged detention of immigrant children by the Office of Refugee Resettlement, we write in advance of our September 27 status conference with the Court to request an extension of the discovery deadlines the Court entered on July 23, 2018 (ECF No. 82) and to inform the Court of the plaintiffs' intention to move to compel on several outstanding discovery issues within the next week. Should the Court prefer to adjourn Thursday's conference in light of the forthcoming motion practice, the plaintiffs would have no objection.

Joint Request for Amendment to Discovery Schedule

The defendants have told the plaintiffs they will need until November to complete document production in response to document requests served in July and August, thus making it impossible to complete depositions and expert discovery by the deadlines in the current scheduling order. The parties have conferred and respectfully and jointly request the following modification to the scheduling order entered in this case:

- Depositions to be completed by December 17, 2018 (moved from October 31, 2017);

9/26/18
The conference set for 9/27 is adjourned. The
scheduling order is modified as requested. There
is no need for a pre-motion conference. The parties
should meet and confer to develop a discovery motion
scheduled for submission to the Court.
No altered
Paul Crotty
09/26/18

- Requests for admissions to be served no later than November 15, 2018 (moved from October 1, 2018);
- All expert discovery to be completed by February 15, 2018 (moved from December 14, 2018);
- Meet-and-confer on schedule for expert disclosures by December 18, 2018 (moved from November 1, 2018);
- Settlement meeting by January 15, 2018 (moved from November 14, 2018).

Plaintiffs' Anticipated Further Motion Practice

Since the plaintiffs began serving discovery requests on July 10, the parties have conducted several meet-and-confer discussions, with the most recent occurring a few hours ago. Based on these discussions, the plaintiffs anticipate moving to compel on three separate issues related to outstanding requests within the next week. Accordingly, should the Court prefer to adjourn Thursday's conference in anticipation of a forthcoming pre-motion conference related to those disputes, the plaintiffs are amenable to that adjournment.

Respectfully submitted,

/s/ Paige Austin
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AADHITHI PADMANABHAN
ROBERT HODGSON
CHRISTOPHER DUNN

cc: Rebecca Tinio, Jeffrey Oestericher,
Counsel for Defendants (via ECF)